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Filing date: **03/14/2006**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91169295
Party	Defendant Watts Transportation LLC. Watts Transportation LLC. P.O. Box 358 Walnut Grove, CA 95690
Correspondence Address	GREGORY T MEATH MEATH & PEREIRA 306 E MAIN ST STE 303 STOCKTON, CA 95202-2908
Submission	Answer
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Date	03/14/2006
Attachments	DANCING VINE-TM OPPOSITION RESPONSE.pdf ( 5 pages )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No.: 78/589,830

Filed: March 17, 2005

For the Mark: DANCING VINE

Published in the *Official Gazette* on December 20, 2005

Hardy Wine Company Limited,	)	
Opposer,	)	
	)	
v.	)	<b>Opposition No.: 91169295</b>
	)	
Watts Transportation, LLC.	)	
Applicant.	)	
	)	

**APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**

Applicant, Watts Transportation, LLC., for its answer to the Notice of Opposition filed by, Hardy Wine Company Limited against application for registration of Watts Transportation, LLC's standard character trademark, Serial No. 78/589,830 filed March 17, 2005 and published in the *Official Gazette* on December 20, 2005, pleads and avers as follows:

1. Answering paragraph 1 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

2. Answering paragraph 2 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

3. Answering paragraph 3 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

4. Answering paragraph 4 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

5. Answering paragraph 5 of the Notice of Opposition, Applicant admits the existence of United States Trademark Registration No. 2,999,135.

6. Answering paragraph 6 of the Notice of Opposition, Applicant admits the existence of United States Trademark Registration No. 2,122,497.

7. Answering paragraph 7 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

8. Answering paragraph 8 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

9. Answering paragraph 9 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the allegations.

10. No paragraph 10<sup>th</sup> is included in Opposer's Notice of Opposition, thus Applicant does not answer.

11. Answering paragraph 11 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

12. Answering paragraph 12 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

13. Answering paragraph 13 of the Notice of Opposition, Applicant admits that both parties produce and sell wine and that Applicant has neither requested nor been granted any consent or permission of Opposer.

14. Answering paragraph 14 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

15. Answering paragraph 15 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

16. Answering paragraph 16 of the Notice of Opposition, Applicant denies each and every allegation contained therein.

In view of the foregoing, Applicant contends that this opposition is groundless and baseless in fact; that Opposer has not shown wherein it will be, or is likely to be, damaged by the registration of Applicant's trademark; that Applicant's trademark is manifestly distinct from any alleged mark of the Opposer or any designation of the Opposer and Applicant prays that this Opposition be dismissed and that Applicant be granted registration of its trademark.

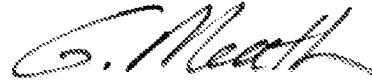
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Respectfully submitted,

MEATH & PEREIRA  
Attorneys & Counselors  
By:

Date: March 14, 2006

A handwritten signature in black ink, appearing to read "G. Meath". The signature is fluid and cursive, with a large initial "G" and a stylized "Meath".

GREGORY T. MEATH  
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Stockton, CA 95202-2907  
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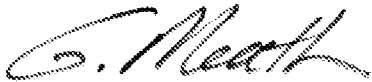
Counsel for Applicant  
Watts Transportation, LLC.

**Certificate of Service**

I hereby certify that a copy of the foregoing APPLICANT'S ANSWER TO NOTICE OF OPPOSITION was mailed first-class mail, postage prepaid, to

**Stephen L. Baker  
Baker & Rennelis PA  
626 North Thompson Street  
Raritan, N.J. 08869**

Attorneys for Opposer HARDY WINE COMPANY LIMITED, Inc. this 14th day of March, 2006.

A handwritten signature in cursive script, appearing to read "G. Meath".

Gregory T. Meath  
Attorney for Applicant